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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

September 11, 1992

ORIGINAL
FILE

The Honorable
Alfred C. Sikes
Chairman
Federal Communications Commission
1919 M Street, N.W. - Room 814
Washington, D.C. 20554

Dear Chairman Sikes:

The Commission has asked for comment on various HDTV allotment/assignment proposals set forth in its Second Further Notice, released on August 14, 1992, and on various proposals (based on replication/interference protection/service maximization principles) submitted by the undersigned parties as long ago as March 10, 1992. However, the Second Further Notice does not set forth certain information about its proposals that are necessary for us to evaluate those proposals. The information needed for this purpose is elaborated in the attachment hereto.

For example, of the four principles identified by the Commission for the design of an HDTV table of allotments, two of the principles -- those involving the definition of ATV service areas and the use of UHF spectrum -- cannot be effectively evaluated in the absence of the requested information. Thus, the Second Further Notice proposes to restrict all initial HDTV allotments (with the exception of 17) to UHF channels, and it proposes to use a minimum 85-90 km

service area as a basis for allotting HDTV channels. We think the record would benefit from taking these two (as well as other) assumptions, applying them to the system-by-system results yielded from the ATV testing process and calculating the resulting ATV service areas and the impact of HDTV interference to existing NTSC service. Then these results would enable the Commission and the public to analyze and comment on the approach proposed in the Second Further Notice.

While we can generate this coverage and service information for our own recommended approach, we cannot do so with respect to the approach proposed in the Second Further Notice. This is because the record does not disclose what assumptions underlie the approach in the Second Further Notice, such as the power and heights used to determine the minimum service areas and the assumptions used to determine the desired signal-to-noise ratios and the desired-to-undesired signal ratios in the presence of interference. These items and the other information here requested are needed for generating coverage and service information and otherwise evaluating the proposals in the Second Further Notice. One piece of information necessary for such evaluation, namely the specific locations of the sites assumed for each allotment set forth in the Second Further Notice's sample table, has already been put into the record in a separate

document by the Commission's staff. We also note that the Commission's staff has placed in the record information about a trial HDTV table with a bias toward VHF allotments.

As you know, the Advisory Committee, in which broadcasters are active participants, has made significant progress in this area. Working Party 3 of the Planning Subcommittee has just completed a report on the allotment/assignment implications of the NHK Narrow-MUSE system and is expediting its analysis of the allotment/assignment implications of the first digital system to be tested, the GI-Digicipher system. Other systems will be analyzed as the data become available.

The Commission's staff, which also participates in the activities of the Advisory Committee including PSWP3, has been offered access to these analyses, both past and future, and since spring of this year the undersigned have offered the Commission access to the software they have used to evaluate allotment/assignment issues. The capability of generating allotment/assignment tables utilizing the replication/interference protection/service maximization principles is also in the hands of the Advisory Committee. While PSWP3 is not planning to issue such tables at this time, the undersigned have prepared tables of allotments/assignments based on the MUSE system test results and will do the same for all the

other systems that have been or are being tested. This information will also be made available to the Commission, on request.

We are prepared to submit initial comments by the October 13 deadline, but until the information specified in the attachment hereto is made available, we believe that the commenting and decision-making process cannot be effectively concluded. Accordingly, we also request that the Commission hold this docket open until at least 30 days after the needed information is placed in the Commission's public docket file for this proceeding.

Respectfully submitted,

ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.

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Docket File No. 87-268

September 11, 1992

LIST OF INFORMATION REQUESTED

1. Are the terms "service area" and "coverage area" as used in the Second Further Notice (particularly in describing its objective of achieving a "minimum" service area of 85 to 90 km for all ATV stations) the same as the definitions adopted by the Advisory Committee?[1/]

2. What are the power and height parameters used to achieve the 85 to 90 km "minimum" service area for all ATV stations?

3. What are the maximum power and height parameters used by the Second Further Notice to achieve a "maximum" service area?

4. What criteria did the Commission use to allot ATV channels for adjacent communities that use co-located transmitting sites? Specifically, what technical criteria did the Commission use to differentiate between the ATV channels allotted to the communities of Linden, Paterson, and Secaucus, N.J., and the pool of ATV channels allotted to the New York City and Newark, N.J., communities, recognizing that all the communities mentioned above use the same transmitting location.?

5. What technical parameters (planning factors) are used by the Second Further Notice to determine the ATV minimum service area?

6. For interference purposes, what technical parameters (planning factors) are used to compute NTSC station service areas?

7. What signal-to-noise ratio assumption did the Second Further Notice use to determine the coverage areas of ATV stations? What is the maximum coverage area for ATV stations in the sample table?

[1/] The Advisory Committee defines "service area" -- whether NTSC or ATV -- as the area contained within the station's noise-limited contour reduced by the interference within that contour, i.e., interference-limited contour. Coverage area, on the other hand, is defined as the area contained within the station's noise-limited contour without regard to interference from other stations, i.e., noise-limited service. See Section 7.2.2.1 of Draft of the Advisory Committee ATV System Recommendation Report (version 8/10/92) SS/WP4.

8. What desired-to-undesired signal (D/U) ratio assumptions (ATV-to-NTSC, NTSC-to-ATV and ATV-to-ATV) did the Second Further Notice use to determine the service areas of ATV stations? Did the Second Further Notice use the FCC VHF and UHF curves -- F(50,50) and F(50,10) -- to compute the interference areas?